

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION**

MICHELLE MARIE LEFEBRE,  
PERSONAL REPRESENTATIVE OF THE  
ESTATE OF SHELLSEA BLAIR LEFEBRE-SCHIEL,

Case No. 2:17-cv-00152-GJQ-TPG

Hon. Gordon J. Quist

Plaintiff,

-vs-

REMINGTON ARMS COMPANY, LLC.

Defendant.

---

Leonard A. Siudara (P20542)  
Leonard A. Siudara PC  
Attorneys for Plaintiff  
5865 Andover Ct.  
Troy, MI 48098  
(248) 417-7300  
budatlaw@msn.com

Edward P. Perdue (P55888)  
Dickinson Wright PLLC  
Attorneys for Defendant  
200 Ottawa Avenue, NW, Ste. 1000  
Grand Rapids, MI 49503  
(616) 458-1300  
eperdue@dickinsonwright.com

Dale G. Wills  
James B. Vogts  
Swanson, Martin & Bell LLP  
Attorneys for Defendant  
330 N. Wabash, Ste. 3300  
Chicago, IL 60611  
(312) 321-9100  
dwills@smbtrials.com  
jvogts@smbtrials.com

---

**REMINGTON'S OBJECTION TO PLAINTIFF'S COMBINED 1<sup>st</sup>  
INTERROGATORIES, 3<sup>rd</sup> REQUEST FOR ADMISSIONS & 3<sup>rd</sup> NOTICE TO  
PRODUCE DOCUMENTS**

Pursuant to Fed.R.Civ.P. 36(a)(3), Remington objects to the above referenced discovery as untimely under Fed.R.Civ.P. 26(d)(1) and irrelevant to Defendant's pending Motion to Dismiss under Fed.R.Civ.P. 26(d)(1).

Respectfully submitted,

DICKINSON WRIGHT PLLC

By /s/Edward P. Perdue  
Edward P. Perdue  
200 Ottawa Avenue, NW, Suite 1000  
Grand Rapids, MI 49503  
(616) 458-1300  
eperdue@dickinsonwright.com

Dale G. Wills  
James B. Vogts  
Swanson, Martin & Bell LLP  
330 N. Wabash, Suite 3300  
Chicago, IL 60611  
(312) 222-8517  
dwills@smbtrials.com  
[jvogts@smbtrials.com](mailto:jvogts@smbtrials.com)

*Attorneys for Defendant*

Dated: March 7, 2018

GRAPIDS 76841-1 492393v1